

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	1:16 cr 265
v.	)	
	)	
NICHOLAS YOUNG	)	

GOVERNMENT'S NOTICE OF EXPERT TESTIMONY

The United States provides this Notice of Expert Testimony pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G) and Rules 702, 703, and 705 of the Federal Rules of Evidence. It is anticipated that the government will offer the expert testimony described below during its case-in-chief at trial.

1. Paul Lee, a special agent and computer forensic examiner with the Federal Bureau of Investigation. In particular, Special Agent Lee will testify regarding his analysis of (a) the cell phone seized from the defendant on the date of his arrest; (b) the cell phone found on the bed of the truck carrying the defendant's client's vehicle on the date of his arrest; (c) the laptop, camera, and computer media found in the defendant's residence in August 2016. His *curriculum vitae* is attached and his reports have been provided to the defendant in discovery.

2. Special Agent Alan Vanderplog, a special agent and computer forensic examiner with the Federal Bureau of Investigation. In particular, Special Agent Vanderplog will testify regarding his analysis of the iPod and a cell phone found in the defendant's residence in August 2016. His *curriculum vitae* is attached and his reports have been provided to the defendant in discovery.

3. Conroy V. Jett, a computer forensic examiner with the Federal Bureau of Investigation. In particular, Mr. Jett will testify regarding his analysis of the computer media found in the defendant's residence in 2011. His *curriculum vitae* is attached and his reports have been provided to the defendant in discovery.

5. Daveed Gartenstein-Ross, a privately-employed scholar, practitioner, and author. Dr. Gartenstein-Ross will testify as an expert regarding violent non-state actors, and the civil war in Libya. He will testify regarding (a) the commonalities between radicalization mechanisms in militant Islamism and neo-Nazism; (b) the historical convergence between segments of the militant Islamist and Nazi or neo-Nazi movements; (c) the Abu Salim Martyrs' Brigade; and (d) the cultural significance of certain items seized from the defendant or found in his possession relating to militant Islam and Nazi or neo-Nazi movements. His report is attached, and includes his *curriculum vitae*.

Stipulations reached by the parties may moot the need for the testimony of the computer forensic examiners listed above.

Respectfully submitted,

Dana J. Boente  
United States Attorney

By: /s/  
Gordon Kromberg  
Assistant United States Attorney  
United States Attorney's Office  
2100 Jamieson Avenue  
Alexandria, VA 22314  
Phone: (703) 299-3700  
Email: Gordon.kromberg@usdoj.gov

**CERTIFICATE OF SERVICE**

I hereby certify that on the 17th day of November 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF, which will send a notification of such filing (NEF) to counsels of record.

\_\_\_\_\_/s/  
Gordon D. Kromberg  
Assistant United States Attorney  
Virginia Bar No. 33676  
Assistant United States Attorney  
Attorney for the United States  
2100 Jamieson Avenue  
Alexandria, VA 22314  
(703) 299-3700  
(703) 837.8242 (fax)  
[gordon.kromberg@usdoj.gov](mailto:gordon.kromberg@usdoj.gov)